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19 Attorneys for Defendant Pacific  
20 Life Insurance Company

21 UNITED STATES DISTRICT COURT

22 DISTRICT OF NEVADA

23 BRIAN C. TANKO, Ltd; BRIAN  
24 TANKO, and VICTORIA TANKO,

25 Plaintiffs,

26 v.  
27 PACIFIC LIFE INSURANCE  
28 COMPANY; CBZ RETIREMENT  
SOLUTIONS, LLC; CORY ZIMET;  
ECONOMIC CONCEPTS, INC.;  
ECI PENSION SERVICES, LLC;  
MEDALIST PENSION ADVISORS,  
LLC; PENSION STRATEGIES, IBP,  
LLC, and KENNETH R.  
HARSTEIN,

Defendants

29 } CASE NO: 2:11-cv-02073-GMN-GWF

30 } DEFENDANTS' JOINT UNOPPOSED  
31 } MOTION FOR EXTENSION OF TIME  
32 } TO RESPOND TO COMPLAINT

33 } (FIFTH REQUEST)

34 Insofar as a global resolution of this case appears to be  
35 imminent, Defendants move the Court for a one week extension of time to  
36 respond to Plaintiffs' complaint up to and including April 5, 2012 pursuant  
37 to LR 6-1. The parties have been diligently working to reach an early  
38

1 resolution of this dispute. It now appears that a global resolution of this  
2 case is imminent. As such, a one week extension is requested concerning  
3 this matter. Plaintiffs' counsel has no objection to this request.

4 On November 14, 2011, Plaintiffs commenced this action by filing a  
5 complaint in the Eighth Judicial District Court, Clark County, Nevada. On  
6 December 22, 2011, Pacific Life removed this action to federal court and all  
7 other defendants consented to the removal. The parties have since  
8 conferred in good faith and are presently discussing the potential for an  
9 early resolution of this matter, which now appears to be imminent.

10 This request for an extension is made in good faith and not made for  
11 the purpose of undue delay. Therefore, the Defendants respectfully  
12 requests that the Court grant its motion.

13 Respectfully submitted:

14 MORRIS LAW GROUP

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28 LLC; Medalist Pension Advisors, LLC  
and Kenneth R. Harstein

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Attorney for Pension Strategies,  
IBP, LLC

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**ORDER**

It is so ordered. All served Defendants shall have up to and including April 5, 2012 to answer or otherwise respond to the Complaint.

Dated: March 30, 2012.

  
GEORGE FOLEY, JR.  
United States Magistrate Judge

MORRIS LAW GROUP  
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## CERTIFICATE OF SERVICE

2 Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of  
3 Nevada Electronic Filing Procedures, I certify that I am an employee of  
4 MORRIS LAW GROUP, and that the following documents were served via  
5 electronic service: **DEFENDANTS' JOINT UNOPPOSED MOTION FOR**  
6 **EXTENSION OF TIME TO RESPOND TO COMPLAINT (FIFTH REQUEST)**

7 | TO:

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Dated this 24 day of March, 2012.

By: analogalls